

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Blake Lively,
Plaintiff,

v.

Wayfarer Studios LLC, Justin Baldoni, et al.,
Defendants.

Case No. 1:24-cv-10049-LJL

**SUPPLEMENTAL NOTICE CONCERNING RULE 24 MOTION AND
POTENTIAL SETTLEMENT**

To the Honorable Judge Liman:

Movant Brett Douglas McDowell respectfully submits this notice to address recent developments suggesting that the parties may imminently settle or narrow the above-captioned matter. Movant is not a party to the action but has filed a Rule 24 motion seeking limited intervention and preservation of access to discovery materials that reference his name, likeness, or protected disclosures concerning symbolic retaliation, identity targeting, and reputational harm.

Recent filings, including the withdrawal of emotional distress claims by Plaintiff Blake Lively and the corresponding motion by Defendants (ECF No. 262), increase the likelihood of imminent settlement or stipulated dismissal. Movant is concerned that such developments, if finalized without addressing his pending Rule 24 motion, could result in

the sealing, redaction, or omission of documents that directly concern his interests—without opportunity for review, objection, or clarification of the record.

Movant does not oppose settlement or resolution of the primary dispute. However, he respectfully requests that:

1. No sealing or confidentiality stipulation be approved as to discovery materials that reference or reflect upon Movant;
2. No dismissal order be entered in a manner that would foreclose Movant’s procedural right to review such materials;
3. Movant’s Rule 24 motion be ruled upon, or at minimum heard, before any such orders are finalized.

Movant appreciates the Court’s attention to these concerns and reiterates that he seeks only limited preservation and fairness—not disruption of the proceedings. A failure to resolve these procedural issues in advance of sealing or dismissal would risk reputational harm and exclusion inconsistent with the integrity of the record.

Respectfully submitted,

/s/ Brett Douglas McDowell

Brett Douglas McDowell

Winnipeg, Manitoba, Canada

June 02, 2025